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March 31, 2005

MS. BETH O'DONNELL
EXECUTIVE DIRECTOR
KENTUCKY PUBLIC SERVICE COMMISSION
211 SOWER BLVD.
FRANKFORT KY 40602

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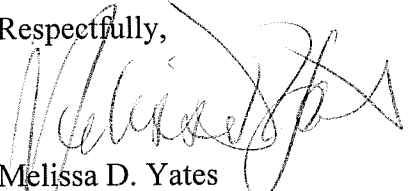
**Re: Motion for Mediation
Ballard Rural Telephone Cooperative Corporation, Inc.
v.
Jackson Purchase Energy Corporation
PSC Case No. 2004-00036**

Dear Ms. O'Donnell:

Please find enclosed an original and ten (10) copies of a motion for mediation in the above referenced matter. I have also enclosed an additional copy for file-stamping, which I would ask that you return to me in the enclosed self-addressed, stamped envelope.

Should you need any further information from me regarding this filing, please do not hesitate to contact me.

Respectfully,


Melissa D. Yates
Attorney for Jackson Purchase Energy Corporation

64751

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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COMMISSION

IN THE MATTER OF:

BALLARD RURAL TELEPHONE
COOPERATIVE CORPORATION, INC.

PSC CASE NO. 2004-00036

v.

JACKSON PURCHASE ENERGY CORPORATION

**JACKSON PURCHASE ENERGY CORPORATION'S
MOTION FOR MEDIATION**

Comes the defendant, Jackson Purchase Energy Corporation ("JPEC"), through counsel, hereby requests the Commission to order mediation between the parties. As grounds for its Motion, Defendant states as follows:

1. Whereas mediation is an informal process in which a neutral third person facilitates the resolution of a dispute between two or more parties, mediation is an alternative way to try to resolve this matter. Defendant believes this would be helpful, reduce the costs of litigation to both parties, and might negate any need for further rulings by the Commission.

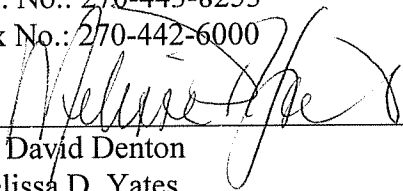
2. Defendant wishes to resolve their dispute with Plaintiff in the most expedient way possible.

WHEREFORE, the Defendant, Jackson Purchase Energy Corporation, does hereby request the Commission to enter an order:

1. Requiring the parties to attend a mediation conference set at a location, date, and time certain to be determined by the mediator
2. Allowing Counsel of record for any party being permitted to attend the mediation conference.
2. Naming a mediator of the Commission's choosing.
3. Containing a statement that the mediation process is non-binding and that a resolution only be reached by voluntary agreement of the parties on all or part of the issues in dispute.
4. Requiring that the mediation conference be held within one-hundred twenty (120) days from the entry of the order requiring mediation
5. Requiring any agreement between the parties to be in writing and to have the parties sign off on their agreement by Agreed Order prior to the conclusion of the mediation conference.
6. Requiring that any such Agreed Order into the record herein and to enforce said agreement by all powers available to the Commission.
7. Requiring that the mediator shall be compensated at his or her standard hourly rate and that all costs associated with the hiring of the mediator be borne equally by the parties.
8. Mandating that said mediation conference shall be considered as settlement negotiations for purposes of KRE 408.
9. Requiring the mediator report to the Commission the results of the mediation conference.

Respectfully submitted,

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By 
W. David Denton
Melissa D. Yates

ATTORNEYS FOR DEFENDANT

I hereby certify that 10 copies of the
foregoing were filed with the Public Service
Commission by mailing via Federal Express to:

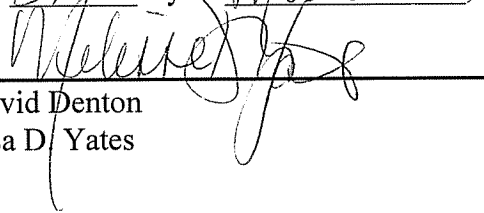
BETH O'DONNELL EXEC DIR
PUBLIC SERVICE COMMISSION
215 SOWER BLVD
P O BOX 615
FRANKFORT KY 40601

True and correct copies of the
foregoing have been mailed to:

HON ANITA MITCHELL ATTY
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HON JOHN E. SELENT
DINSMORE & SHOHL LLP
1400 PNC PLAZA
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(502) 540-2300

on this 31st day of March, 2005.

By: 
W. David Denton
Melissa D. Yates